

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

United States of America,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
Shane Twigg,	)	Case No.: A-05-0041 CR. (RRB)
	)	
Defendant.	)	
_____	)	

**NON-OPPOSED MOTION ON SHORTENED TIME TO CONTINUE SENTENCING**

A period of excludable delay under 18 U.S.C. 3161(h)(1)(F) may occur as a result of the filing/granting/denying of this motion.

COMES NOW, Shane Twigg, by and through counsel, Robert M. Herz, of the Law Offices of Robert Herz, P.C., and hereby moves this court to continue the sentencing that is presently scheduled in this matter for June 19, 2006 at 10:00 a.m. Additional time is needed to investigate objections to the draft pre-sentence report raised by Mr. Twigg and to investigate other pertinent facts related to sentencing in this matter.

No prejudice will inure to the government by any delay in sentencing as Mr. Twigg will likely be serving at least 24 months in this matter. Counsel has spoken with Mr. Twigg and he does not object to the sentencing being continued.

Counsel requests that the sentencing be continued until at least August 23, 2006 or sometime thereafter that is convenient to the court. Counsel has spoken with AUSA Nesbett who non-opposes this motion to continue to the date requested by counsel. Counsel has also notified the United States Probation office of this request.

Law Offices of Robert Herz, P.C.  
425 G Street, Suite 600 • Anchorage, AK 99501  
Phone 907-277-7171 • Fax 907-277-0281  
E-mail rmherz@gci.net

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DATED at Anchorage, Alaska, this 6th day of June 2006.

THE LAW OFFICES OF ROBERT HERZ, PC

s/ Robert M. Herz  
425 G. Street, Suite 600  
Anchorage, Alaska 99501  
Phone 907-277-7171  
Fax 907-277-0281  
[rmherz@gci.net](mailto:rmherz@gci.net)  
AK Bar No. 8706023

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425 G Street, Suite 600 • Anchorage, AK 99501  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 6th day of June 2006, a true and correct copy of the Motion to Continue Sentencing was faxed to the following: USPO Scott Kelley (271-3060) and served electronically on the US Attorney By: s/Robert Herz